

## REMARKS

### Response to Arguments

Claims 1, 3, 4, 6-30 and 43-72 remain pending in this application. Applicants note with appreciation the Examiner's acknowledgement of previously presented arguments and the discussion of an Examiner's amendment. The Examiner's concerns regarding the new grounds of rejection are addressed in detail below.

### Regarding the 35 U.S.C. §102 Rejections over Gough

In the outstanding Office Action, the Examiner rejected remaining Claims 1, 3, 4, 6-30 and 62-63 under 35 U.S.C. §102(e) as being anticipated by Gough et al. (U.S. Pat. No. 6,360,221 B1; hereinafter, Gough). In particular, regarding Claim 1, the Examiner asserts that Gough discloses:

In a multi-user e-mail messaging system interfaced through the Internet and including at least a first user group sharing at least a first server, which first server is, in turn, interfaced to the Internet such that any user of the first user group may send an e-mail message for transfer to an intended recipient selected as at least one of another user in the first user group and a remote user interfaced to the Internet by a connection other than said first server (fig. 1 items 10, 12, 14, 15 and 16; also see abstract), a method comprising:

after said e-mail message has been originated by an originating user of the first user group, directing the e-mail message onto an e-mail enhancement path, including (i) receiving the e-mail message at said first server, (ii) altering the e-mail message, and (iii) directing the altered e-mail message to a second server located on the e-mail enhancement path (column 18, lines 3-20; column 4, lines 1-21);

adding additional rich media content to said e-mail message using the e-mail enhancement path to produce an enhanced e-mail message (fig. 2B; column 6, line 12-39); and

thereafter, directing the enhanced e-mail message from the e-mail enhancement path to the intended recipient (fig. 3, column 7, lines 43-61; column 3, lines 50-67).

Applicants respectfully disagree with the Examiner's assertion at least for reasons discussed immediately hereinafter.

To anticipate a claim, the reference must teach every element of the claim and "the identical invention must be shown in as complete detail as is contained in the ... claim." *MPEP 2131* citing *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 2 USPQ2d 1051 (Fed. Cir. 1987) and *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 9 USPQ2d 1913 (Fed. Cir. 1989).

Applicants respectfully submit that Gough does not teach every element of Claim 1. The Examiner relies upon cited FIG. 1 items 10, 12, 14, 15 and 16, the abstract, column 18, lines 3-20 and column 4, lines 1-21 of Gough for disclosure of the limitation of, after the e-mail message has been originated by an originating user of the first user group, directing the e-mail message onto an e-mail enhancement path, including (i) receiving the e-mail message at said first server, (ii) altering the e-mail message, and (iii) directing the altered e-mail message to a second server located on the e-mail enhancement path. Applicants respectfully submit that, while Claim 1 recites the directing of an e-mail message AFTER origination by the originating user onto an e-mail enhancement path, the cited passages of Gough teach the generation of the e-mail message with enhanced content attached thereto at the same site, as will be further described immediately below.

Firstly, Applicants respectfully submit that, in the field of e-mail communications, a distinction is made between a “message” or “message content” and an “e-mail”. For example, in FIG. 1 and the Abstract of Gough, which are cited by the Examiner, Gough clearly states that a message (i.e., “message content,” column 4, line 3) is input by a sender (item 12, FIG. 1) through the Internet (items 13A and 16, FIG. 1) into a server (item 10, FIG. 1), which hosts a website (item 11, FIG. 1) that enhances the message content and sends an e-mail including enhanced content to a recipient. That is, in the system as disclosed by Gough, the sender only originates the MESSAGE CONTENT and not the E-MAIL message – the message content as generated by the sender does not include other required portions of an e-mail message, such as complete header information required for e-mail message delivery. In contrast, the present application provides for the origination of an outbound E-MAIL MESSAGE, including information in addition to the message content (see, for example, paragraph [0081] of the application as filed). While the cited passage at column 18, lines 3-20 of Gough (i.e., Claim 21 of Gough) mentions “a message including text to be sent as e-mail” and creating “an enhanced e-mail including a combination of said text and said self-executing program and associated information,” it appears that only this “text” is what is generated by the sender and not the complete e-mail. In other words, the sender of Gough does not originate an e-mail message, as recited in Claim 1 of the present application, but only the message content.

Another view of this same concept is that Gough teaches the enhancing of the e-mail message BEFORE the e-mail message is sent “under the guidance of the user” (column 4, lines 6-7). That is, as Gough describes in column 4, lines 2-9, a sender enters the message content at “website 11 through the Internet 16 as indicated at 13A”, then website 11, “under the guidance of the sender, “enhances” the message content and sends or “e-mails” the message to one or more recipient mail boxes as illustrated at 13B” (emphasis added). This situation is similar to one discussed in the Background section of the present application, where the sender-specified incorporation of rich media content into e-mail messages is specified prior to the original send event (see, for example, paragraph [0009] and related FIG. 1 of the present application as filed). As discussed in the present application as filed, such methods are disadvantageous

because they hinder centralized creation, administration and incorporation of rich media in messages sent from standard multi-user e-mail messaging systems while potentially adding considerable bandwidth burden to local networks. In contrast, Claim 1 of the present application recites the enhancement of the e-mail message AFTER the e-mail message has been originated by the originating user; that is, while provisions are made in the present disclosure for user specification of the enhancements to be made to the e-mail message, the actual enhancement of the e-mail message may be controlled by a centralized administrator. The advantages inherent in a method such as that recited in Claim 1 are discussed, for example, in paragraphs [0069] and [0070] of the present application as filed.

Secondly, while the Examiner relies upon FIG. 2B and column 6, lines 12-39 of Gough to teach “adding additional rich media content to said e-mail message using the e-mail enhancement path to produce an enhanced e-mail message,” it is respectfully submitted that these cited passages merely describe “an exemplary member sign-up webpage” with a listing of “enhanced e-mail functionality” that might be provided to a member who subscribes to such a services. There is, however, no description of how such features may be implemented. Applicants respectfully submit that mere listing of potential features does not constitute a reasonable disclosure of how one might add “additional rich media content to said e-mail message using the e-mail enhancement path”, as provided by Claim 1 and described in detail throughout the present application.

Thirdly, it is unclear to Applicants how FIG. 3, column 7, lines 43-61 and column 3, lines 50-67 of Gough relate to “directing the enhanced e-mail message from the e-mail enhancement path to the intended recipient. FIG. 3 is merely “an illustration of an exemplary e-mail” (column 3, line 5). The cited paragraph at column 7, lines 43-61 states that a “web browser” at “sender machine 12” is used to interact with a “website hosted on the server” (which is in contrast to the earlier discussed limitation of Claim 1 that the originating user originates the e-mail message, not merely interact with a website), then generally states how a recipient might access the enhanced e-mail message without any details of how such routing of an e-mail message from an originating sender to an intended recipient may be provided. Furthermore, the cited paragraph at column 3, lines 50-67 only generally describes a configuration including “a server machine 10, a sender machine 12, and a recipient machine 14 coupled to a global network, such as the Internet 16” with a listing of a few options for use in such a configuration as well known in the art of e-mail messaging. It is respectfully submitted that these cited passages do not constitute sufficient teaching of the step of directing the enhanced e-mail message from an originating sender to an intended recipient as provided in Claim 1.

Therefore, at least for the above reasons, it is respectfully submitted that the cited passages fail to meet the limitations as recited in Claim 1. As indicated in the present application (e.g., in FIG. 4 and in paragraphs [0070] and [0240] of the application as filed), the e-mail enhancement path refers to an outbound message routing path through which selective addition of rich media content is performed *after* a user

generates the e-mail message. The enhancement path includes: 1) a first process containing a routing application; and 2) a second process containing a processing application for selective addition of rich media content to outbound e-mail messages. In contrast, Gough states that the sender inputs message content (i.e., message text) at a website. That is, Claim 1 provides that an originating user first generates an e-mail message without enhancements then, *after* the e-mail message has been sent by the originating user, this non-enhanced e-mail message is directed onto an e-mail enhancement path, where the rich media content may be added so as to create an enhanced e-mail message. As clearly illustrated in, for example, FIG. 4 of the present application as filed, an e-mail client at the user computer generates an e-mail message, then the generated e-mail message is redirected onto an enhancement path. It is respectfully submitted that Gough does not disclose or suggest in any way that communication of an e-mail message includes such function of the enhancement path for the selective addition of rich media content, as provided in Claim 1. Therefore, in light of at least the above arguments, Applicants respectfully submit that Claim 1 overcomes the art of record.

Each of Claims 3, 4, 6-13 and 27-30 depends either directly or indirectly from and therefore include the limitations of amended Claim 1. Accordingly, it is respectfully submitted that each of these claims is also patentable over the art of record for at least the reasons set forth above with respect to Claim 1. Further, each of these dependent claims places additional limitations on their parent and intermediate claims which, when considered in light of Claim 1, further distinguish the claimed invention from the art of record.

For example, Claim 3 provides that receiving the e-mail message at the first server includes TCP/IP socket communication. Regarding Claim 3, the Examiner again relies on the previously cited passage at column 3, lines 50-67. Applicants respectfully submit that, while the cited passage mentions “the well-know[sic] TCP/IP packet network protocols”, it merely refers to protocols such as SMTP, POP and IMAP that are used in standard network architecture for e-mail delivery; that is, the cited passage does not disclose TCP/IP socket communication, as required in Claim 3, which is a network protocol that enables communication between a standard e-mail server and the e-mail enhancement path, as described in detail in the present application. Therefore, it is respectfully submitted that the art of record does not anticipate the limitations as recited in Claim 3.

As another example, Claim 4 provides that “receiving includes using direct API access.” The Examiner relies on FIG. 11 and column 14, lines 38-45 of Gough as providing disclosure to this matter. Applicants respectfully disagree with the Examiner. In particular, the cited figure and passage refers only once to an “API” in the description of step 1112 “ATTACH MESSAGE DATA”, where “the string and appendages, or message data, is attached to a message object (i.e., e-mail message) using the JAVA mail API; that is, the cited passage concerns the use of a known application program interface available from Sun Microsystems for message delivery. In contrast, the “direct API access” of Claim 4 refers to capture of an e-mail message from a conventional message delivery route to an enhancement path (see, for example,

paragraph [0112] and FIG. 13 of the present application. Therefore, it is respectfully submitted that the art of record does not anticipate the limitations as recited in Claim 4.

As another example, Claim 6 recites that the e-mail message includes a header section, which contains information regarding the originating user and the intended recipient, and wherein altering the e-mail message includes separating and modifying the header section in a predetermined way. The Examiner additionally relies on FIG. 3, item 36 of Gough, as assertedly teaching the limitations provided in Claim 6. It is unclear to Applicants how the cited portion of Gough teaches separation and modifying the header section in the way described in the present application. In particular, item 36, FIG. 3, is described in Gough as “a header 36 with sender, recipient, and “Re” information” without any teachings to modification of header 36. Moreover, it should be appreciated that this alteration takes place after the e-mail has been sent by the originating user. Therefore, it is respectfully submitted that the art of record does not anticipate the limitations as recited in Claim 6.

The Examiner further relies upon the citation of item 36, FIG. 3, of Gough for teachings of limitations as recited in Claims 7-11. As Claims 7-11 all depend directly or indirectly from Claim 6 discussed above, it is respectfully submitted that the arguments presented in relation to Claim 6 are also applicable to Claims 7-11. That is, Gough does not teach or suggest in any way the separating and modifying of the header, as provided in Claim 6 and, consequently, Claims 7-11. At least for this reason, it is respectfully submitted that Claims 7-11 overcome of the art of record.

Claim 14 is an independent claim including limitations which reflect certain limitations of Claim 1, as discussed above. For example, like Claim 1, Claim 14 recites limitations of, after the e-mail message has been originated by an originating user of the first user group, directing the e-mail message onto an e-mail enhancement path and adding additional rich media content to the e-mail message using the e-mail enhancement path to produce an enhanced e-mail message. Therefore, it is respectfully submitted that the arguments presented above in relation to these certain limitations and regarding the allowability of Claim 1 over Gough are also applicable to Claim 14. Furthermore, Claim 14 additionally recites providing a validation of the request such that the additional rich media content is added to the e-mail message responsive to the validation. The Examiner relies on the previously cited passages of FIG. 3, column 7, lines 43-61 and column 3, lines 50-67 of Gough for teachings of the limitations recited in Claim 14. It is respectfully submitted that neither these cited passages nor Gough as a whole mention the addition of a request or the validation of such a request before including additional rich media content in an enhanced e-mail message. For at least these reasons, Applicants respectfully submit that Claim 14 overcomes the art of record.

Each of Claims 15-24 depends either directly or indirectly from and therefore include the limitations of Claim 14. Accordingly, it is respectfully submitted that each of these claims is also patentable over the art

of record for at least the reasons set forth above with respect to Claim 14. Further, each of these dependent claims places additional limitations on their parent and intermediate claims which, when considered in light of Claim 14, further distinguish the claimed limitations from the art of record.

For example, Claim 17 provides for adding a message ID tag for identifying the e-mail message, which message ID tag is unique to that e-mail message. The Examiner relies on column 14, lines 15-36 of Gough for teachings of this limitation. Applicants respectfully disagree and submit that the cited passage is merely a listing of exemplary HTML code (or HTML “tags”) that may be appended to the message text provided by a sender. While Gough states that such parameters “may be used to identify the letter, expression, word, phrase, pattern, format, etc.”, these parameters are not the same as the message identification tags for use as recited in Claim 17. As clearly stated in, for example, paragraph [0085] of the present application, a tag in the context of the present application refers to information to permit a subsequent external enhancement server process to add desired rich media content which may have been added by a user plug-in. For at least these reasons, it is respectfully submitted that Claim 17 overcomes the art of record.

The Examiner relies on the teachings of column 14, lines 15-36 of Gough to assert that the limitations recited in Claims 15 and 17-24 are anticipated by Gough. These claims specifically recite limitations regarding inserting one or more reference tags into the e-mail message for use in the aforementioned validation limitation of Claim 14, ranging from adding a group ID tag, adding a template ID tag, controlling such additions at an administrative level and determining where, in relation to the header, such tags may be added. It is not clear to Applicants how the teachings of column 14, lines 15-36 of Gough are applicable to the variety of limitations recited in Claims 15 and 17-24; that is, the cited material of Gough appears to be irrelevant to the limitations at hand when viewed in a reasonable light. As stated above in reference to Claim 14, the cited passage does not teach, disclose nor suggest in any way the validation of a request for additional rich media content and, moreover, does not teach how such validation may be performed using reference tags, as recited in Claims 15 and 17-24.

Claim 25 is an independent claim including certain limitations similar to those of Claim 1, as discussed above. For example, like Claim 1, Claim 25 provides, after the e-mail message has been originated by an originating user of the first user group, directing the e-mail message onto an e-mail enhancement path and adding additional rich media content to the e-mail message to produce an enhanced e-mail message. Therefore, it is respectfully submitted that the arguments presented above relating to these certain limitations and regarding the allowability of Claim 1 over Gough are also applicable to Claim 25. Claim 25 additionally recites the use of an outgoing message path that includes at least one different process as compared to the incoming e-mail message path. The Examiner relies on teachings in column 18, lines 3-20 and column 4, lines 1-21 of Gough for this limitation in Claim 25. Applicants respectfully submit that Gough, in the cited

passages, does not disclose, teach nor reasonably suggest in any way an inbound message may be received by a sender at sender machine 12, FIG. 1. In contrast, Claim 25 specifically provides separate paths for inbound and outbound e-mail messages, enhanced or otherwise, to be received and sent by a user. For at least this reason, Applicants respectfully submit that Claim 25 overcomes the art of record.

Claim 26 depends directly from and therefore include the limitations of Claim 25. Accordingly, it is respectfully submitted that Claim 26 is also patentable over the art of record for at least the reasons set forth above with respect to Claim 25. Furthermore, Claim 26 additionally recites that routing the e-mail message to an out-going message path includes directing the e-mail message through a second server, which second server is outside of the in-coming e-mail message path. While the Examiner relies upon FIG. 1, items 12 and 15 in Gough for teachings to the limitations as claimed in Claim 26, it is respectfully submitted that Gough does not teach an in-coming e-mail message path in the cited figure; therefore, Applicants respectfully submit that the art of record does not teach the limitations as recited in Claim 26.

Claim 62 is an independent claim including limitations which reflect certain limitations recited in Claim 1, as discussed above. For example, like Claim 1, Claim 62 provides directing the e-mail message to a predetermined location after the e-mail message has been originated by an originating user of the first user group and adding additional rich media content to the e-mail message to produce an enhanced e-mail message. Therefore, it is respectfully submitted that the arguments presented above in relation to these certain limitations and regarding the allowability of Claim 1 over Gough are also applicable to Claim 62. In addition to the cited passages previously discussed in reference to Claim 1, the Examiner relies on the teachings in FIGS. 4 and 8, with an observation that “any number of instructions can be used in directing the message” (Office Action, p. 11), for the third instructions for directing the enhanced e-mail message to the intended recipient. It is unclear to Applicants how the teachings in FIGS. 4 and 8 relate to such instructions for directing the enhanced e-mail message to the intended recipient IN COMBINATION WITH first instructions for directing the e-mail message to a predetermined location after the e-mail message has been originated by an originating user. As Gough states in column 8, lines 40-54, FIG. 4 is a “flowchart illustrating the execution of the first application program associated with the first electronic message that is sent to a first user”; that is, the flowchart in FIG. 4 refers to the HTML processes that take place when a sender 12, FIG.1, accesses website 11, FIG. 1, in order to generate an e-mail message. FIG. 8 is an illustration of a graphical user interface (GUI) associated with the execution of a “second application program,” which may include a “signed application program.” It is respectfully submitted that the Gough is not explicit as to exactly what is meant by the “first application program” and the “second application program”, much less how FIGS. 4 and 8 relate to the directing of an enhanced message to the intended recipient. While FIG. 8 appears to include a “destination” box 800 for insertion, by a user, of a destination address, Gough does not specify how such destination specification in the GUI would be implemented by software to direct an enhanced e-mail message to the specified destination. In contrast, the present

application describes in detail ways in which header information in an e-mail message may be manipulated in order to intercept and modify an e-mail message originated by an originating user. For at least these reasons, Applicants respectfully submit that Claim 62 overcomes the art of record.

Claim 63 depends directly from Claim 62 and, therefore, includes all of the limitations as recited in Claim 62 such that the above arguments regarding Claim 62 are also applicable to Claim 63. Additionally, Claim 63 includes a further limitation that the first, second and third instructions are distributed at least among the first user group and the first server. The Examiner relies on FIGS. 4 and 8 of Gough to provide the teachings to the limitations as recited in Claim 63. Applicants respectfully submit that FIGS. 4 and 8 and their associated descriptions do not suggest in any way the distribution of the instructions in the process shown in FIG. 4 or the GUI interface of FIG. 8 among different components in the configuration shown in FIG. 1. At least for these reasons, it is respectfully submitted that Claim 63 is not anticipated by the art of record.

Hence, it is respectfully submitted that all of remaining Claims 1, 3, 4, 6-30 and 62-63 overcome the Examiner's 35 U.S.C. §102(e) rejections over Gough. Therefore, Applicants respectfully request the passage of these Claims to allowance.

**Regarding the 35 U.S.C. §103 Rejections over Gough in view of Shapiro et al.**

In the outstanding Office Action, the Examiner rejected remaining Claims 43-61 and 64-72 under 35 U.S.C. §103(a) as being unpatentable over Gough in view of Shapiro et al. (U.S. Pat. No. 6,965,926 B1; hereinafter, Shapiro). Specifically regarding Claim 43, the Examiner states that Gough discloses a multi-user e-mail messaging system substantially as claimed in Claim 43, but does not specifically disclose the details of "directing the e-mail message to a first location inside the firewall and forwarding the e-mail message to a second location outside the firewall, as provided in Claim 43. The Examiner relies on Shapiro at column 11, lines 46-54, column 20, lines 58-67, and column 3, lines 25-31 for such teachings related to firewalls. Applicants respectfully disagree for at least the reasons discussed in detail immediately hereinafter.

Firstly, while the Examiner asserts, on page 12 of the outstanding Office Action, that Gough discloses "said messaging system including a firewall surrounding said first user group and said first server", it is respectfully submitted that Gough is absent of any teachings related to firewalls. In fact, the term "firewall" does not appear in the entirety of Gough.

Secondly, Applicants respectfully submit that Shapiro is not in the same field of endeavor as Gough because, while Gough is concerned with the CREATION of enhanced e-mail messages, Shapiro is concerned with the RECEPTION and VIEWING of content-rich communications, regardless of how the content-rich communication was generated. Therefore, it is respectfully submitted that there is no motivation to combine the teachings of Gough with those of Shapiro.



Thirdly, the only time the term “firewall” is used in Shapiro is at column 11, line 49, where it is mentioned in passing that “farms of computers” may function as firewalls. There is no discussion in Shapiro of how a firewall relates to the creation and enhancement of previously created e-mail messages, as recited in Claim 43 of the present application. While the lengthy passages from Shapiro cited by the Examiner in pages 13 and 14 of the outstanding Office Action relate to essentially a laundry list of possible configurations of multiple computers and security protocols, it is respectfully submitted that a mere mention of a firewall does not constitute a teaching of the limitations as claimed. In other words, there is no teaching in Shapiro to the performance of specific tasks related to the enhancement of e-mail messages (or any message generation-related processes for that matter) at distinct locations with respect to a firewall. Although the Examiner asserts that the incorporation of “Shapiro’s teachings of firewalls to secure an e-mail message[,] with the enhanced e-mail within an enhancement path teachings of Gough, for the purpose of “to provide a comprehensive solution for receiving and viewing content-rich communications and messages that enable efficient delivery of such messages while avoiding the need for large downloads and issues with latency. . .” as stated by Shapiro in lines 25-31 of column 3” (page 14, Office Action), Applicants respectfully submit that there is no teaching in either Gough or Shapiro to motivate the combination of an e-mail enhancement system with a firewall for any reason.

In contrast, the present application as filed discusses in detail the architectural flexibility of the disclosed e-mail messaging system to advantageously provide compatibility with a variety of firewall and security configurations (see, for example, paragraph [0173]). More specifically, Claim 43 provides for validation of a request for additional rich media content at a first location inside a firewall and a subsequent addition of the desired additional rich media content at a second location outside of the firewall to produce an enhanced e-mail message. In other words, Claim 43 provides for an e-mail enhancement path that is distinct from a standard e-mail messaging path and resides at a location distinct from the originating user as well as the mail servers. Such a configuration is described in detail in the present application as filed in, for example, FIG. 7 and associated paragraph [0082]. Therefore, Applicants respectfully submit that Gough and Shapiro, separately or in combination, do not teach the limitations as recited in Claim 43.

Each of Claims 44-61, 64, 66, 68, 70 and 72 is an independent claim including limitations which reflect certain limitations recited in Claim 43, as discussed above. For example, each of Claims 44-61, 64, 66, 68, 70 and 72 recite different processes related to enhanced e-mail message generation performed at distinct locations with respect to a firewall that surrounds a first user group and a first server. Therefore, it is respectfully submitted that the arguments presented above in relation to these certain limitations and regarding the allowability of Claim 43 over the combination of Gough and Shapiro are also applicable to Claims 44-61, 64, 66, 68, 70 and 72. For at least these reasons, Applicants respectfully submit that Claims 44-61, 64, 66, 68, 70 and 72 overcome the art of record.

Claim 65 depends directly from Claim 64 and, therefore, includes all of the limitations as recited in Claim 64 such that the above arguments regarding Claim 64 are also applicable to Claim 65. Additionally, Claim 65 includes a further limitation that a second server is located at a predetermined location (outside of the firewall) such that the first through sixth instructions are distributed among the first user group and the first server (surrounded by the firewall) and the second server. The Examiner relies on FIG. 3, column 7, lines 43-61, and column 3, lines 50-67 of Gough to assertedly provide the additional teachings to the limitations as recited in Claim 65. However, Applicants respectfully submit that the cited passages do not teach the addition of rich media content to an e-mail message, responsive to a validation of a request for desired additional rich media content, to produce an enhanced e-mail message AFTER the e-mail message has been originated by an originating user, nor do they teach the distribution of the instructions for the producing the enhanced e-mail message at specific locations in relation to a firewall, as recited in Claim 65. Therefore, it is respectfully submitted that Claim 65 overcomes the art of record.

Claim 67 depends directly from Claim 66 and, therefore, includes all of the limitations as recited in Claim 66 such that the above arguments regarding Claim 66 are also applicable to Claim 67. Additionally, Claim 67 includes a further limitation that the first through sixth instructions are distributed at least among the first user group and the first server. The Examiner relies on column 18, lines 3-20 and column 4, lines 1-21 of Gough to assertedly provide the additional teachings to the limitations as recited in Claim 67. However, it is respectfully submitted that the cited passages do not teach the addition of rich media content to an e-mail message, responsive to a validation of a request for desired additional rich media content, to produce an enhanced e-mail message AFTER the e-mail message has been originated by an originating user, nor do they teach distribution of the instructions for producing the enhanced e-mail message at specific locations in relation to a firewall, as recited in Claim 67. Therefore, it is respectfully submitted that Claim 67 overcomes the art of record.

Claim 69 depends directly from Claim 68 and, therefore, includes all of the limitations as recited in Claim 68 such that the above arguments regarding Claim 68 are also applicable to Claim 69. Additionally, Claim 69 includes a further limitation that the predetermined location, at which the desired additional rich media content to the e-mail message is added responsive to a validation, is situated outside of a firewall surrounding the first user group and the first server. The Examiner relies of column 18, lines 3-20 and column 4, lines 1-21 of Gough to provide the additional teachings to the limitations as recited in Claim 69. However, Applicants respectfully submit that the cited passages are absent of any teachings to distribution of e-mail processing with respect to a firewall. Therefore, it is respectfully submitted that Claim 69 overcomes the art of record.

### **Regarding the additional references cited in the outstanding Office Action**

Although the Examiner additionally cited Shostack et al. (U.S. Pat. No. 6,298,445; hereinafter, Shostack) and Donaldson (U.S. Pat. No. 6,321,267) within the context of these rejections, Shostack and Donaldson were not specifically mentioned in relation to any of the rejected remaining claims. Clarification is respectfully requested. If there is no subsequent explicit rationale given in relation to these references, it is respectfully submitted that any Office Action responsive hereto should not be made final, since it will be Applicants' first opportunity to respond to the rejections.

### **Conclusion**

Consequently, it is respectfully submitted that all of the Examiner's objections regarding the remaining claims have been overcome and that the application is in condition for allowance. Hence, allowance of these remaining claims and passage to issue of the application are solicited.

If the Examiner has any questions concerning this case, the Examiner is respectfully requested to contact Michael Pritzkau at 303-410-9254.

Respectfully submitted,  
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